

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 5:25-cv-00462-G
)	
PLAZA HOTELS, LLC; STEVE)	
KETTER; MICHAEL WILEY; OKC)	
AIRPORT ES, LLC; ESH STRATEGIES)	
FRANCHISE, LLC; KAJAL)	
HOSPITALITY, INC; JALIYAN)	
HOSPITALITY, INC; SUPER 8)	
WORLDWDE, INC; RAJ KRUPA)	
HOTEL, LLC; DAYS INNS)	
WORLDWIDE, INC; CHAND & SAAJ)	
HOSPITALITY, INC; RAMADA)	
WORLDWIDE, INC; YASH)	
ENTERPRISES, INC; HOWARD)	
JOHNSON INTERNATIONAL, INC;)	
NOOR HOTEL, LLC; AMBICA, LLC;)	
OM, LLC; INDRA, LLC; AND G6)	
HOSPITALITY FRANCHISING, LLC,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENDING BRIEFING SCHEDULE RELATED TO
ANY FIRST AMENDED PETITION**

COME NOW, Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., Howard Johnson International, Inc. (collectively, the “Wyndham Franchisor Defendants”), and ESH Strategies Franchise, LLC (“ESH Strategies,” and together with the Wyndham Franchisor Defendants, the “Moving Defendants”) and respectfully move the Court for an order extending the briefing schedule applicable to any

Amended Petition that Plaintiff may file related to her *Motion for Leave to File Amended Petition*. In support, the Moving Defendants state:

1. On May 14, 2025, Moving Defendants filed their Motions to Dismiss. Docs. 25, 26, and 31.

2. On May 28, 2025, Plaintiff filed a consolidated response and request for leave to amend her complaint. Doc. 58.

3. Contemporaneously with this filing, Moving Defendants shall file a ‘notice of non-opposition’ to Plaintiff’s request for leave to amend her complaint.

4. The parties have conferred and agreed that, should a First Amended Petition be filed, the following briefing schedule will govern any motion to dismiss directed at that First Amended Petition:

- a. Moving Defendants shall file any motion to dismiss to the First Amended Petition within 21 days after the First Amended Petition is filed.
 - b. After Plaintiff’s response is filed, Moving Defendants shall have 14 days to file their reply.
5. The Wyndham Franchisor Defendants previously obtained a short extension respond to answer or otherwise respond to the original Petition pursuant to a state-court agreement predating removal, which this Court granted on April 25, 2025. Doc. 9. Further, Plaintiff stipulated to an extension of time for ESH Strategies to respond. Doc. 19. These are the only extensions Moving Defendants have sought to date.

6. Plaintiff has agreed to this extended briefing schedule.

7. Granting this Motion is in the interests of justice and judicial economy and is otherwise the right and proper thing to do.

8. This Motion is not sought for delay, but so that justice may be done.

WHEREFORE, Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., Howard Johnson International, Inc., and ESH Strategies Franchise, LLC pray that the Court grant this Motion and allow them to file a motion to dismiss within 21 days after any First Amended Petition is filed and file their replies within 14 days of any responses filed by Plaintiff.

Dated: June 6, 2025

Respectfully submitted,

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& ANDERSON, L.L.P.

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CERTIFICATE OF SERVICE

I hereby certify that, on June 6, 2025, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system, electronic mail to:

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